

TECO ENERGY, INC.
Comments on 2 GHz Licensed PCS

Interest: Utility company.

Amount of spectrum per licensed system:

- Supports a minimum allocation of 30 MHz. (p. 2).

Service areas:

- FCC should authorize a "wholesale only" license that would be limited to selling capacity on a network to resellers. (p. 2).

Licensing policies:

- Supports a lottery system limited to pre-qualified applicants. (p. 2).

Other:

- The definition of PCS should be limited primarily to mobile service, with fixed use permitted on an ancillary basis to PCS mobile. (p. 2).

**TELECOMMUNICATIONS INDUSTRY ASSOCIATION,
MOBILE COMMUNICATIONS DIVISION
Comments on 2 GHz Licensed PCS**

Interest: Trade association for manufacturers of wireless communications products.

Amount of spectrum per licensed system:

- FCC should provide each new PCS entrant with sufficient spectrum to increase the potential for initiating service on a shared basis with incumbent microwave users, while relocation negotiations are pending. (pp. 8-9).

Technical standards:

- FCC should encourage industry efforts to develop a limited number of common air interface standards. (pp. 5-6).

TELEPHONE & DATA SYSTEMS, INC.
Comments on 2 GHz Licensed PCS

Interest: Provider of telephone, cellular and paging services.

Amount of spectrum per licensed system: 20 MHz.

Band plan:

- FCC should allocate spectrum for five PCS providers per service area, each with 20 MHz of spectrum, to encourage broad and diverse participation in PCS. (pp. 5-8).

Service areas:

- Supports use of 734 MSAs and RSAs to serve the goal of localism, encourage the provision of rural PCS and allow small PCS providers to compete. (pp. 8-13).

Cellular carrier participation:

- Cellular carriers should be allowed to hold PCS licenses for service areas within or outside of their cellular service areas. (pp. 19-22).

Local exchange carrier participation:

- LEC eligibility to hold PCS licenses should not be limited because of cellular holdings; LEC participation in PCS will serve the FCC's four goals, and fears of anticompetitive behavior can be addressed by adopting non-structural safeguards. (pp. 13-17).
- Due to capacity limitations and the support of analog transmission, LECs cannot use cellular spectrum to provide PCS. (pp. 13-19).

Licensing policies:

- FCC should evaluate proposals for a PCS provider to hold multiple licenses in the same service area on a case-by-case basis. (pp. 25-26).
- Supports a lottery procedure for PCS licenses, so long as stringent applications qualifications are adopted to deter speculative applications. (pp. 26-30).

Regulatory status:

- PCS should be subject to common carrier regulation based on the FCC's projection of PCS as a "universal" service offered to the public and connected to exchange services. (pp. 22-25).

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- PCS licensees should enjoy the same right of interconnection to the PSTN as existing common carriers. (p. 26).

Other:

- FCC should restrict the service definition of PCS as little as possible to allow the industry to grow. (p. 30).

TELEPORT DENVER LTD.
Comments on 2 GHz Licensed PCS

Interest: Competitive access provider.

Band plan:

- FCC should consider authorizing a different number of PCS licenses depending on the size of each market; alternatively, the FCC should set a maximum number of licenses for each market and let the market determine the optimal number. (p. 6).

Service areas:

- PCS service areas should be based on the existing LATA structure because this would enable regional firms to implement PCS efficiently. (pp. 7-8).

Cellular carrier participation:

- Opposes cellular carrier eligibility for PCS licenses within their current service areas because this would reduce the number of service providers and the variety of services. (pp. 2-4).

Local exchange carrier participation:

- Opposes LEC eligibility for PCS licenses in their current service areas because this could lead to anticompetitive results and discriminates against non-wireline cellular carriers. (pp. 4-5).

Licensing policies:

- Supports restricting an entity from holding more than one PCS license per market, but opposes limiting the total number of licenses an entity may hold. (p. 5).
- If the FCC adopts a lottery licensing scheme, applicants should be required to make complete financial and technical showings. (p. 6).

Regulatory status:

- If the FCC prohibits LECs and cellular carriers from receiving PCS licenses in their existing service areas, then PCS providers should be classified as non-dominant carriers; if LECs and cellular carriers are permitted to obtain PCS licenses in their current service area, they should be regulated as common carriers. (pp. 8-9).
- Supports a strong interconnection policy that ensures any PCS provider can obtain the same functionality at

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the same rate as any other PCS provider. (pp. 9-10).

TELESCIENCES, INC.
Comments on 2 GHz Licensed PCS

Band plan:

- Urges FCC not to target the 2.1-2.2 GHz band for PCS use if the FCC decides to allocate additional spectrum to PCS. (pp. 1-6).

TEL/LOGIC, INC.
Comments on 2 GHz Licensed PCS

Interest: Experimental PCS licensee.

Band plan:

- The proposed allocations together with the transition rules for incumbent OFS usage are likely to create PCS implementation problems. (pp. 2-5).
- FCC can ameliorate this problem through one of two approaches: allow PCS licensees to pool and jointly use their assigned frequencies in a given area, or issue only two licenses in a geographic area. (pp. 5-6).

Service areas:

- Because PCS will compete with local exchange service, the service area should be aligned with the cellular MSAs or the LATAs, provided cellular and local exchange carriers are precluded from obtaining PCS licenses in their service areas. (p. 7).
- The worst combination would be nationwide and local service areas because local operators would be competitively disadvantaged. (p. 8).

Cellular carrier participation:

- Supports barring cellular carriers from providing PCS within their existing service areas, but states that these carriers should be allowed to provide PCS-like services in their current spectrum. (pp. 9-10).

Local exchange carrier participation:

- Supports barring LECs from providing PCS in their existing service areas, but favors limited experimental participation. (pp. 9-10).

Licensing policies:

- Speculative applications in a lottery proceeding must be deterred, but high application fees and short filing windows discriminate against smaller entrepreneurial companies. (pp. 11-12).
- One frequency block in each market should be reserved for qualified experimental licensees and pioneer's preference applicants ("PCS developer block"). (pp. 13-15).

Regulatory status:

- PCS should be regulated as a non-dominant carrier. (p. 16).
- PCS operators should be granted a federally protected right to interconnection to PSTN and cellular networks. (p. 16).

Technical standards:

- Instead of the theoretical and restrictive interference rules proposed, a practical approach should be adopted that requires monitoring actual PCS power levels at OFS receiver sites. (p. 17).

Other:

- Supports the FCC's four goals, but suggests a fifth: to assure that entrepreneurial telecommunication entities participate in the development of PCS. (p. 1).

TELMARC TELECOMMUNICATIONS, INC.
Comments on 2 GHz Licensed PCS

Interest: Not stated.

Band plan:

- Recommends that the FCC issue three licenses per market initially, with a fourth and fifth license assignable if competition proves inadequate. (pp. 15-19).

Amount of spectrum per licensed system:

- FCC should award 20 MHz to each licensee and retain 10 MHz per licensee in reserve for future use. Allocation of the reserve should be based on licensees' competitive performance. (pp. 12-15).

Cellular carrier participation:

- Cellular carriers should be denied PCS licenses in markets they currently serve because they will use PCS spectrum in an anticompetitive fashion. (pp. 34-36).

Local exchange carrier participation:

- LECs should be eligible to participate in PCS so long as they guarantee equal and unbundled access to the LEC network. (pp. 28-34).

Licensing policies:

- Supports competitive bidding as the best licensing procedure and proposes that bidders demonstrate technical and financial qualifications. (pp. 24-28).

Regulatory status:

- PCS should be regulated as a common carrier because this is consistent with "universal system" with open interfaces and open architectures. (pp. 36-39).

Technical standards:

- FCC should require in-band interoperability through standards developed by a limited number of industry consortia. (pp. 19-24).
- FCC should establish a nationwide PCS laboratory to develop and evaluate new technologies and standards for the industry. (pp. 39-43).

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Other:

- Exhibit 1: Economic Structural Analysis of Wireless Communications Systems.

TELOCATOR**Comments on 2 GHz Licensed PCS**

Interest: The Personal Communications Industry Association representing paging, cellular, cable television, local and interexchange telephone companies and other participants in new and existing wireless services.

Band plan:

- Believes that the full 140 MHz of spectrum in the 1850-1990 MHz band should be allocated for terrestrial broadband PCS service. (pp. 2-3)

Service areas:

- Does not believe that national PCS service areas or LATA-based service areas are in the public interest. Rather, smaller service areas would benefit competition by increasing entry opportunities. (pp. 7-10)

Cellular carrier participation:

- Opposes any prohibition on the participation of cellular carriers in new spectrum allocations. (p. 5)

Local exchange carrier participation:

- Believes all qualified applicants should be permitted to pursue new PCS spectrum allocations. (p. 5)
- Opposes a separate 10 MHz allocation in the 1850-1990 MHz band for wireless local loop services as it disserves the public interest by limiting diversity and competition. (pp. 4, 6)

Licensing Policies:

- Asserts that no multiple ownership limits should exist where there is no overlap in service areas. Further states that there should be no restrictions on a single operator holding licenses for both 900 MHz narrowband PCS and 2 GHz broadband PCS in the same service area nor restrictions on a single operator providing both licensed and unlicensed 2 GHz services or devices. (p. 6)
- Supports the Notice's proposed ten year license term for PCS services in conjunction with a renewal expectancy to enable PCS providers to establish economically viable systems. (p. 10)

- Supports qualified lotteries as the licensing mechanism for PCS. (pp. 10-12)
- Recommends adoption of the highest non-refundable legally defensible filing fees. (p. 11)

Regulatory status:

- Asserts that a uniform set of regulations should apply equally to the full family of PCS, including both new offerings and existing services such as cellular. (p. 13)
- Urges adoption of Telocator's Flexible Service concept. (p. 13)
- Concurs that PCS carriers, regardless of regulatory status, should have equal rights to interconnection with the PSTN. (pp. 13-14)

Technical Standards:

- Technical standards for PCS should be left to industry standards groups -- an FCC mandated technical advisory committee is unnecessary. (pp. 14-19)
- Interoperability and intersystem roaming should not be required at this time. (p. 18)
- Agrees that EIA/TIA Bulletin TSB10-E appropriately addresses interference protection for private operational fixed microwave systems but does not believe that its current level of protection should be the standard. (p. 18)
- Power and height requirements should be based upon a blanket limitation that meets RF health hazard requirements but allows maximum flexibility for service requirements in the 1850-1990 MHz band. (p. 19)

TIME WARNER TELECOMMUNICATIONS
Comments on 2 GHz Licensed PCS

Interest: PCS experimental licensee.

Band plan:

- The available spectrum should be divided between two PCS licensees per market because there is not enough clear spectrum to support more licensees. (pp. 10-12).

Amount of spectrum per licensed system:

- A minimum of 40 MHz should be allocated to each licensee since initial allocations of spectrum will be affected by existing 2 GHz usage. (pp. 4-7).

Service areas:

- Supports licensing of two PCS operators, one licensed on a nationwide basis and the other licensed regionally based on the 47 Major Trading Areas. This scheme promotes roaming, economies of scale, and expeditious licensing. (pp. 7-10).

Licensing policies:

- Supports the use of lotteries to select PCS licensees with stringent technical and financial application requirements to prevent speculation. (pp. 19-23).

Regulatory status:

- FCC should allow a licensee to choose which type of regulation is more appropriate for the services it plans to offer. (pp. 15-19).
- Supports a federally protected right to interconnection with the PSTN and regulatory safeguards to prevent other kinds of discrimination by the LEC. (pp. 13-15).

Technical standards:

- Recommends that the FCC not adopt any height or power limits for PCS base stations other than those necessary to address interference and health concerns. (pp. 12-13).

UNITED STATES DEPARTMENT OF JUSTICE
Comments on 2 GHz Licensed PCS

Interest: Government agency

Band plan:

- Allocate three blocks of 30 MHz each for licensed systems and a 20 MHz block for unlicensed devices. (p. 11 n.13)

Amount of spectrum per licensed system:

- If 20, 25, or 30 MHz appears to be the proper amount of spectrum for a particular license, the Commission should allocate as many licenses as available spectrum permits (e.g., 3 x 30 MHz, 4 x 25 MHz, 5 x 20 MHz). (p. 14)
- Allocating 30 MHz per licensee appears to be reasonable. (p. 14)
- Providing for too many licenses is not a problem, since even if a system is unbuilt, the threat of new entry will restrain pricing (as long as consolidation is not allowed). (pp. 14-15)

Service areas:

- Supports MSA/RSA licensing, noting that there may also be advantages in adopting large areas that more closely approximate current cellular service areas. (pp. 16-17)
- MSAs/RSAs more easily permit cellular entry and promote development in less populated areas. (pp. 22-23)
- The transaction costs identified relating to MSAs/RSAs are the consequence of a competitive market, which should be encouraged. (p. 17 n.19)
- The benefits of national license areas, to the extent they are desirable, can be achieved without national licenses. (pp. 17-18)
- DoJ is still considering regional areas, but notes that such areas have exclusory effects on entry and that development in cellular may have been influenced by a variety of factors that may not affect PCS -- wireline set-aside for companies with "regional" bases, the "efficient size" of PCS versus cellular. (p. 19-21)

Cellular carrier participation:

- Cellular should not be permitted to participate in-region, at least for a period of four years. (p. 29)

- LECs should not be permitted to participate where their affiliates have cellular systems, at least for a period of four years. (p. 29)
- LECs should not be accorded preferential treatment affecting their ability to acquire a license or the amount of spectrum they can obtain. (p. 30)

- DoJ believes the optimum licensing scheme would be auctions, with a fall-back position of postcard lotteries. (pp. 33-34)
- A temporary ban on the ownership of multiple licenses is warranted -- no entity should hold more than one license in a market. (pp. 23-28)
- Ban on in-market mergers should be revisited in four years. (pp. 28-29)

- The Commission should be cautious in imposing regulatory constraints on either cellular or PCS licensees that would impede their ability to compete with each other. (p. 9)

- The FCC's plans for relocation lead to an economically efficient outcome, and the transition period should be short, e.g., 3 years. (pp. 13-14)

- PCS carriers should have a federally protected right to interconnection. (pp. 30-32)
- The FCC should encourage the development of private industry standards, particularly alternate CAIs. (p. 33)
- The FCC should not impose more onerous height/power restrictions on PCS than on cellular. (p. 9)

UNITED STATES SMALL BUSINESS ADMINISTRATION
Comments on 2 GHz Licensed PCS

Interest: Governmental agency

Amount of spectrum per licensed system:

- Urges the Commission to license at least 5 PCS providers in each market to encourage diversity, rapid implementation, and the participation of small businesses in the provision of PCS (10-11).
- Each PCS licensee should be awarded 20 MHz. The benefits of increased competition and lower prices outweigh the costs associated with less capacity (12).

Service areas:

- Supports the development of licensing areas smaller than either a national or regional basis. For this purpose, the Commission should consider MSAs/RSAs (18-19).

Cellular carrier participation:

- Opposes any restrictions on cellular participation in PCS. Licensing at least 5 entities in each market should allay any fears of decreased competition (21-23).
- However, would support proposed restrictions if number of PCS licensees were limited to three (23).

Local exchange carrier participation:

- Opposes any restrictions on LEC participation in PCS. Debarment of LECs may doom rural areas to second-class status (21-23).
- However, would support proposed restrictions if number of PCS licensees were limited to three (23).

Licensing policies:

- Supports a post-card lottery process (24).
- Urges the Commission to take strong action against the potential abuses of application mills (25-26).
- Urges the Commission to prohibit the assignment or transfer of PCS licenses for a set period of time (26).

Regulatory status:

- Supports efforts to replace rate regulation with control of prices through market competition (28).

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- Supports proposal to permit interconnection comparable to that received by other customers of the PSTN (28).
- PCS should be classified as common carrier (28-29).

UNITED STATES TELEPHONE ASSOCIATION
Comments on 2 GHz Licensed PCS

Interest: Trade association of exchange carrier industry

Band plan:

- 1850-1900/1930-1980 MHz divided into 5 licensed paired channel sets of 20 MHz (p. 31).

Amount of spectrum per licensed system:

- Proposes 20 MHz per system. (p. 31).

Service areas:

- Recommends that Commission utilize 734 cellular licensing areas, 306 MSAs and 428 RSAs, to establish initial service areas for PCS. (p. 19).

Local exchange carrier participation:

- Supports allowing exchange carriers to provide PCS within their respective serving areas in order to facilitate development of cost-effective, high quality, and widely-deployed wireless services and to enhance value of public switched network. (pp. 7-16).
- States that an exchange carrier's cellular holdings should not affect its eligibility to obtain a PCS license in its serving area because most exchange carriers do not have preferential access to cellular spectrum to offer any radio-based service to their customers; allowing participation would foster diversity of competitive services. (pp. 16-19).
- Supports set-aside of one of the five licensed blocks of 20 MHz spectrum, within a RSA, for exchange carriers to provide PCS in their exchange service area; believes this set-aside is necessary to ensure that PCS is available in non-metropolitan areas. (pp. 22-27).

Licensing policies:

- States that comparative hearings are more likely to yield qualified applicants. (p. 27).
- If lotteries are used, recommends strict financial and technical qualifications, definite construction commitments and deadlines, short filing windows and significant, yet fair, filing fees. (pp. 27-28).
- If lotteries are selected, would support "postcard" type lottery, where only one application per entity per

serving area would be accepted and no contingent winners chosen. (pp. 28-29).

Regulatory status:

- States that non-discriminatory interconnection of PCS with the public switched telephone network is in the public interest. (pp. 33-35).
- Favors regulatory parity among PCS providers. (p. 35).
- Believes that PCS should be provided as a common carrier service. (p. 35).

Plan for relocation of existing users:

- Recommends adoption of negotiated relocation program as proposed by Commission. States that proposed channelization plan that will allow design of low capacity systems in higher frequency bands will make relocation more feasible. (p. 32).
- Advocates new user compensating existing user for all costs of relocation; proposed replacement system must be as reliable as existing system. (p. 33).
- Recommends that, in cases where existing users oppose relocation, alternative dispute resolution techniques be employed. (p. 33).

Technical standards:

- States that common air interface standards to establish interoperability are necessary to enhance value of PCS. Believes that Commission should insist that the necessary industry groups develop standards quickly and should require applicants to state that they will participate in standards setting and will deploy interoperable PCS. (pp. 36-37).
- Urges Commission to take steps to reduce potential interference between PCS providers and point-to-point microwave users as well as PCS-PCS interference. Emphasizes that PCS should be established as low-power, high-capacity system. (p. 37).

Other:

- Suggests refining definition of PCS in such a way as to distinguish PCS as a new competitive service offering. (pp. 2-6).

U S WEST, INC.
Comments on 2 GHz Licensed PCS

Interest: Provider of landline, cellular, and paging telecommunications services.

Band plan:

- Supports allocation of 100 MHz for four licensed PCS providers per market (25 MHz for each) based on an analysis of cost, traffic loads and total market demand. (pp. 9-11).
- The remaining spectrum in the 1850-1990 MHz band should be reserved for allocation in the future and in the interim should be used for PCS experimentation. (pp. 10-11).

Amount of spectrum per licensed system:

- Supports allocating 25 MHz per licensee because this amount will ensure a high level of service quality without creating unnecessary costs. (pp. 3-7).

Service areas:

- Supports using Major Trading Areas for licensing one of the four PCS providers, and using MSAs and RSAs for licensing the other three providers; the differing geographic scopes will allow different types of PCS to be developed. (pp. 12-15).

Licensing policies:

- Recommends selecting PCS licensees by "qualified" lotteries, which would include substantial financial requirements and construction deadlines, and permitting free transferability of PCS licenses. (pp. 15-18).

Local exchange carrier participation:

- Local exchange carriers should be eligible to obtain PCS licenses without a restriction on the geographic area they serve because such a policy will serve the values of universality, speed of deployment, diversity of services and competitive delivery. (pp. 22-24).
- LEC affiliation with cellular carriers should not bar eligibility for PCS licenses since current FCC rules require full separation of an RHC from its cellular operations, and relaxation of this requirement would not facilitate access to cellular spectrum by telephone companies. Moreover, the knowledge and experience

provided by LECs outweigh the possibility of their anticompetitive behavior. (pp. 24-30).

- Competition at the local exchange level requires that LECs be eligible to utilize emerging technologies. (pp. 30-34).
- United States trade policy supports eligibility for local exchange carriers. (pp. 34-36).

Technical standards:

- Rather than setting limits, the FCC should allow PCS licensees to determine what power level is optimal for their particular service. (pp. 11-12).
- Urges the FCC to encourage the speedy development of interoperability and interconnection standards, including a common air interface, by establishing target dates for the industry to set standards. (pp. 18-22).

Other:

- Invites other parties to comment on U S WEST's "commodity" PCS approach, outlined in Appendix B. (p. 3).

UTILITIES TELECOMMUNICATIONS COUNCIL
Comments on 2 GHz Licensed PCS

Interest: National representative on communications matters for nation's electric, gas, water and steam utilities.

Band plan:

- The Commission should allocate 110-140 MHz for PCS -- 20 MHz for private, internal, non-commercial uses; 10 MHz for LECs and other eligibles; 20 MHz for unlicensed uses; and between 60 and 90 MHz for other licensees (22-23).

Amount of spectrum per licensed system:

- With respect to private, non-commercial uses, these users should be permitted to request the amount of spectrum they require (up to an established cap) (25).
- FCC should license at least 3 commercial licensees, each with up to 30 MHz of spectrum using block plan proposed in the Notice. As an alternative, FCC could authorize a larger number of licensees with varying blocks of spectrum (27-28).
- PCS support spectrum is unnecessary (30-31).

Service areas:

- FCC should not define specific service areas for the non-commercial PCS systems (31).
- Commercial PCS systems should be licensed by LATAs or MTAs to avoid consolidation costs (31-33).

Cellular carrier participation:

- Cellular licensees should not be excluded from PCS licensing within or outside their service areas (33).

Local exchange carrier participation:

- Does not oppose allowing LECs access to 10 MHz of 2 GHz PCS spectrum within their service areas, whether or not they have cellular holdings (34).

Licensing policies:

- The Commission should decide questions regarding licensee mergers on a case-by-case basis (34).
- Supports 10 year license term with high renewal expectancy (35).
- Lotteries should be used to select licensees for both non-

commercial and commercial PCS licenses. Strongly opposes competitive bidding (35, 37).

- To minimize speculation, supports short filing windows, reasonably high filing fees, more stringent entry requirements, narrow eligibility requirements, submission of engineering documentation and firm financial commitment letter, strict construction and operation requirements, and resale restrictions (35-36).

Regulatory status:

- PCS should be regulated as private carriage (38-39).
- Supports giving PCS licensees a federally protected right to interconnect with the PSTN (39-40).

Plan for relocation of existing users:

- Negotiations between PCS licensees and microwave users must be consistent with transition plan adopted in ET 92-9 (29).

Technical standards:

- Interference standards must protect fixed microwave users. The Commission should either select a standards-setting body like the Telecommunications Industry Association (which represents the views of both PCS proponents and existing microwave users) or initiate a negotiated rulemaking (3-10).
- Opposes use of statistical models and weighting factors for calculating path losses and interference potentials. Calculations should be based upon worst case scenarios (10-11).
- Interference analyses must consider microwave path lengths and spectrum sharing techniques (12-13).
- The Commission must limit the number of transmitting mobiles to avoid interference to fixed users (13-14).
- FCC must impose emission limits on band edges (14).
- Maximum antenna height should be limited to 200 feet (14).
- PCS licensees should serve all potentially-affected microwave licensees with a prior coordination notice before filing base station applications (16-17).
- PCS licensees should attempt to work out interference problems among themselves, however, some form of formal dispute resolution mechanism should be adopted (21).
- FCC should require interoperability and roaming capabilities (41-42).

VANGUARD CELLULAR SYSTEMS, INC.
Comments on 2 GHz Licensed PCS

Interest: Provider of cellular communications services throughout United States

Band plan:

- Recommends that Commission license five providers in each PCS market. (pp. 3-5).

Amount of spectrum per licensed system:

- Suggests 20 MHz should be allocated to each provider. (pp. 5-7).

Service areas:

- Supports using MSA and RSA service areas used in cellular licensing for PCS licensing, stating that this arrangement will foster competition and diversity of service. (pp. 9-13).
- Opposes nationwide licensing as not in the public interest. (p. 13).

Cellular carrier participation:

- Supports allowing cellulars carrier to hold PCS licenses in any market, including those in which they provide cellular service. (p. 16).
- States that, if the Commission concludes that cellular providers should not be eligible to hold PCS licenses in their cellular market areas, it must adopt appropriate ownership thresholds that permit de minimis cellular and PCS cross-ownership interests. (pp. 16-20).

Local exchange carrier participation:

- Expresses concern about allowing LECs to apply for and acquire PCS licenses in markets in which they provide local wireline exchange service, but does not object to LECs holding PCS licenses in markets in which they do not provide local exchange service. (p. 14)
- States that Commission must prohibit LECs from applying for or acquiring PCS licenses in their local exchange areas to ensure that they do not engage in discriminatory or otherwise anti-competitive interconnection practices. (pp. 13-15).